

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DIVISION**

Airielle Gregory, f/k/a Scott,

Plaintiff,

v.

Medicredit, Inc., a Missouri corporation,

Defendant.

Case No.: 5:21-cv-00259-AKK

**DEFENDANT’S UNOPPOSED SECOND MOTION TO EXTEND THE DEADLINE
TO RESPOND TO THE PLAINTIFF’S COMPLAINT BY TWENTY-ONE (21) DAYS**

COMES NOW MediCredit, Inc. (“**MediCredit**”) and, pursuant to Rule 6(b) of the *Federal Rules of Civil Procedure*, files this Unopposed Motion to Extend the Deadline to Respond to the Plaintiff’s Complaint by Twenty-One (21) Days on the grounds that follow:

1. Airielle Gregory, F/k/a Scott (the “**Plaintiff**”) filed the instant proceeding on February 19, 2021, and, according to the Court’s docket, served a copy of the complaint and summons on MediCredit on March 5, 2021 [ECF Doc. 6].

2. This Court previously granted MediCredit’s first request to extend its deadline to respond to the complaint, to allow the defendant an opportunity to investigate the claims in this action. The present deadline for a response is Friday, April 16, 2021.

3. The parties to this action are currently negotiating in good faith to resolve this lawsuit.

4. MediCredit avers that granting it an additional twenty-one (21) day extension of the deadline to respond to the Plaintiff’s complaint may limit the accrual of attorney fees and expenses on all of the parties, making a speedy resolution of this case more likely.

5. Rule 6(b) of the *Federal Rules of Civil Procedure* empowers this Court to extend the deadline in question for cause.

6. MediCredit has contacted counsel for the Plaintiff concerning this request for relief. Plaintiff consents to this request for a twenty-one (21) day extension for MediCredit to respond.

WHEREFORE, premises considered, MediCredit, Inc. respectfully requests for this Court to enter an Order: (i) pursuant to Rule 6(b) of the *Federal Rules of Civil Procedure*, extending for a period of twenty-one (21) days the deadline for it to respond to the Plaintiff's complaint; and (ii) granting such relief as this Court deems just and proper.

Respectfully submitted this the 14th day of April, 2021.

/s/ Tazewell T. Shepard IV

Tazewell T. Shepard IV (ASB-6254-I20V)

Attorney for Defendant MediCredit, Inc.

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CERTIFICATE OF SERVICE

This is to certify that I have this the 14th day of April, 2021 served the foregoing document upon David J. Phillips and Mary E. Phillips, *Counsel for the Plaintiff*, Phillips & Phillips, Ltd., 9760 S., Roberts Road, Suite One Palos Hills, IL 60465 and Ronald C. Syktus, *Counsel for the Plaintiff*, Bond, Botes, Syktus, Tanner & Ezzell, P.C., 225 Pratt Ave., Huntsville, AL 35801 by electronic service through the Court's CM/ECF system.

/s/ Tazewell T. Shepard IV

Tazewell T. Shepard IV